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## SECTION D - ARS ENVIRONMENTAL MANAGEMENT FUNCTION

## CHAPTER II - ENVIRONMENTAL PLANNING

### CHAPTER II

#### ENVIRONMENTAL PLANNING

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## CHAPTER II - SECTION D

### ENVIRONMENTAL PLANNING

#### A PURPOSE OF THIS CHAPTER

The purposes of this chapter are to:

- incorporate by reference the NEPA-compliance procedures prescribed by the National Program Staff and promulgated by the Administrator on June 14, 1989;

- note the existence of State clearinghouses and intergovernmental coordination procedures established pursuant to Executive Order (E.O.) 12372, Intergovernmental Coordination; and

- present procedures for completing the Office of Management and Budget Circular A-106 "Federal Agency Environmental Plan - Project Report".

## B PURPOSE OF ENVIRONMENTAL PLANNING

Environmental planning is the component of environmental management in which environmental considerations and needs are incorporated into agency decisionmaking and budgeting. Application of interdisciplinary, state-of-the-art knowledge of the natural/social sciences and environmental design arts results in facilities and actions that minimize, or at least consider, the environmental consequences of agency action.

NEPA, its implementing regulations, and the USDA and ARS NEPA regulations are the baseline requirements for managers and decisionmakers to take a "hard look" at the direct and indirect environmental consequences of their proposed actions at the earliest possible time (i.e., before irreversible commitment of resources). They also specify how managers and decisionmakers are to document their efforts to identify, evaluate, quantify, and consider both the positive and negative environmental effects of their actions. Whenever possible, consideration is given to avoiding or mitigating the adverse environmental effects of proposed actions.

The "hard look" required by NEPA (and parallel State laws applicable to ARS action) often requires

consultations and coordination with other agencies, such as the Army Corps of Engineers for actions involving wetlands, air pollution control agencies for air quality issues, the U.S. Fish and Wildlife Service

when endangered species or their critical habitat may be

## B PURPOSE OF ENVIRONMENTAL PLANNING (Continued)

affected, State historic preservation officers when cultural or historical resources are or may be present, State or local planning agencies, and emergency responders such as fire departments. Under authority given them by E.O. 12372, States have established "clearinghouses" to coordinate their review of Federal proposed actions and documents, including environmental documents, enumerated in their regulations.

In keeping with the intent of NEPA, the views of those affected by, or with a special interest in, a given proposed action are solicited, particularly when the project may be controversial.

If ARS' role in an action proposed by another individual, agency, or organization is to simply grant or deny access or permission to proceed (i.e., to allow exploration of oil or another use of ARS owned or controlled land), ARS may require the actual project proponent to provide all funding and information necessary to complete adequate environmental documentation for the proposed action.

ARS' Environmental Planning Component also entails budgeting and reporting environmental needs to ensure adequate funding for and progress in meeting environmental pollution control requirements. Procedures for meeting the requirements of E.O. 12088 and Office of Management and Budget Circular A-106, (A-106) are described in section E below.

## C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

### 1 Background

NEPA requires Federal agencies to consider the potential impacts of their projects on the environment. ARS already has established regulations for the consideration of the environmental effects of its programs (see 7 CFR 520). In this process ARS research programs are evaluated for NEPA compliance during the preparation of CRIS projects; this procedure is described in the ARS CRIS Documentation Manual. A new companion process for applying NEPA to ARS construction projects is outlined below.

## C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

As provided in NEPA, USDA and ARS published NEPA regulations to supplement the Council on Environmental Quality (CEQ) regulations for NEPA implementation. The CEQ regulations appear at

40 CFR 1500-1508, USDA's at 7 CFR 1b, and ARS' at 7 CFR 520.

The Administrator established procedures for separately evaluating the environmental effects of ARS construction projects and research programs. Both reviews are the responsibility of Area Directors (AD's) in most cases. Procedures for environmental review of research programs and projects are described in the ARS CRIS Documentation Manual. Checklists and instructions for examining the environmental effects of construction projects appear in Exhibit 1.

## 2 Program Summary

The National Environmental Policy Act (NEPA) requires the Agricultural Research Service (ARS) to consider potential impacts of construction projects on the environment. The Area Director (AD) will need to consider a number of factors in determining if the project is categorically excluded or requires the preparation of an Environmental Assessment (EA). In general, repair and maintenance projects can be excluded, while new construction projects that are handled at either the Area or Headquarters should have an EA prepared while in the design stage of the project. The AD is responsible for making and documenting NEPA decisions. One of the following types of decisions must be made for each ARS construction project:

- o Categorical exclusion; Environmental Assessment not required.

- o Environmental Assessment required; Finding Of No Significant Impact.

o Environmental Impact Statement required.

### 3 Policy

It is ARS policy to comply with NEPA law and applicable regulations. Environmental effects of proposed construction projects should be considered during the early stages of planning so that alternatives may be considered and documented. As

described in the ARS NEPA Regulations, it is the

### C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

responsibility of the AD to assure that the NEPA process for evaluation of environmental impacts have been considered in the planned activity.

### 4 Definitions and Criteria

a Categorical Exclusion (CATEX) - project does not require preparation of an EA by virtue of being non-controversial and meeting one of the following criteria:



- o Repair and Maintenance (R&M) of an existing facility or project, including alteration and renovations.

- o Planning, inventory, survey, data collection, and permit activities.

- o Emergency actions to protect life, property, environment; to preserve human health and safety; and to comply with legal requirements.

- b Non-CATEX - project is not categorically excluded. Applies to all new construction or to a construction project of any type known or anticipated to be controversial. Requires preparation of an EA.

- c Environmental Assessment (EA)

- o A short, written document (generally less than 15 pages) prepared during the planning and design phases of a construction project.

- o Describes the construction project and its scope (the research program to be subsequently conducted in the completed project does not need to be included in a construction project EA since the research

will be examined separately during CRIS review and approval).

o Examines the potential impacts of the physical construction activities on the following factors (see Exhibit 1 for a more complete list):

#### C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

- Impacts on the environment such as wetland, flood plain, air quality, critical habitats, endangered species, or a sole source aquifer.

- Effects on archeological site, cultural resource, or historical building/site.

- Action is unprecedented in the local area.

- Action is or could be controversial.

d Finding Of No Significant Impact (FONSI) - one of 2 types of decisions that can be made on an EA, the other being a finding of significant impact which in turn requires preparation of an EIS.

e Environmental Impact Statement (EIS)

- o A more detailed and comprehensive written report required when an EA suggests or indicates a significant impact of a construction project on the environment.

- o Outlines and discusses in detail the environmental impacts of optional construction approaches and alternative courses of actions, including assessment of relative degrees of risk.

- o Allows for extensive public participation in the identification, discussions, and decision-making actions on environmental impact issues.

- o Identifies and adopts mitigating approaches to construction to minimize environmental impacts.

o Documents all substantive issues and alternative viewpoints considered and decisions made.

f Documentation requirements. A CATEX decision, an EA, and/or a FONSI decision must be documented and maintained in the project file for an indefinite period. CATEX or FONSI documentations can simply be a memorandum to the file, signed by the Area Director.

## C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

g Public Disclosure/Public Comment requirements. CATEX decisions, EA documents, FONSI decisions do not need to be published for public notice or comment, but they must be made available to the public upon request. However, an EIS must be published or otherwise made available for public notice and comment prior to and as part of the decision-making process.

## 5 ARS NEPA Procedures

A summary of the NEPA process for ARS construction projects is outlined below in the form of a decision tree. Start with step a and proceed in accordance with the choices selected and decisions made.

a Resources committed to proposed/planned construction project (AD-700 submitted). Based on recommendations from delegated staff, AD is to decide category of project, 1) or 2).

1) CATEX - document decision (AD signature). Proceed with project.

2) Non-CATEX - go to step b.

b Non-CATEX Project - decide 1) or 2).

1) Planning/contracting handled within Area authority - go to step c.

2) Planning/contracting handled within FD authority - go to step d.

c Area Project (Do 1) and 2)).

1) AD requests EA to be prepared (most can be and are expected to be prepared by inhouse staff but the option exists to have EA prepared via contract by outside party).

2) Prepared EA submitted to AD along with recommendations from delegated Area staff. AD go to step e for decision-making choices on EA.

d Headquarters Project (Do 1) and 2)).

1) FD orders EA as part of A&E design contract.

#### C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

2) FD submits EA to AD along with recommendations. AD go to step e for decision-making choices.

e AD decision on EA (Decide 1) or 2)).

1) FONSI - Document decision (AD signature). Proceed with project.

2) Finding of Significant Environmental Impact - go to step f (Prepare EIS).

f Prepare EIS (Do 1), 2), and 3)).

1) AD and staff consult the Office of Technology Transfer for guidance on procedures.

2) Choose inhouse or contract approach to preparation of EIS.

3) Follow the Council on Environmental Quality implementing NEPA regulations for preparation of EIS (40 CFR 1500-1508).

## 6 Discussion

Most ARS activities may be categorically excluded with many of the remainder being addressed through an EA; the more detailed EIS will be required only in rare instances. It is required that each project, regardless of category, include statements that NEPA criteria have been applied and that indicate the Agency decision.

Since each research project conducted at the facility after construction will undergo a separate NEPA consideration during the CRIS review process, the construction activity need only address the physical impacts of actual construction on the environment and need not address program issues to be covered later during the research review process except if the facility will house a new and potentially controversial activity in the area.

The AD is responsible for establishing a specific process consistent with the management structure of the Area to insure that documents are prepared and the analyses are made by appropriate staff having information relevant to the final determination.

#### C NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) (Continued)

Requests for advice and guidance about the NEPA process may be directed to the Area Administrative Officer for procedural aspects or the Office of Technology Transfer for policy considerations.

#### D INTERGOVERNMENTAL COORDINATION



## 1 Background

Consistent with the Intergovernmental Cooperation Act of 1968 and other laws, President Reagan signed Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs. This E.O. directs Federal agencies to give State and local officials the opportunity to review and comment on projects involving Federal assistance or direct Federal development. It also directs Federal agencies to use the State process for conducting this review as early in the planning process as possible.

In setting up their programs, most States established "clearinghouses" to coordinate the E.O. 12372 reviews. They also generally established criteria and thresholds for the types of projects and documentation to be submitted for review.

## 2 Policy

It is ARS policy to comply with E.O. 12372 and clearinghouse procedures on a State by State basis. AD's are to ensure that projects and documents meeting State clearinghouse criteria and thresholds are submitted and that consultations are completed in a timely fashion.

E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106)

## 1 Background

Section 3(a)(3) of Executive Order 12088 requires Federal agencies to submit pollution abatement plans semi-annually to EPA for review. These submission form the basis for approval of pollution abatement projects submitted in agency budgets. The process for developing and maintaining these plans is described by the Office of Management and Budget (OMB) Circular Number A-106 dated December 31, 1974. Through this process, Federal facilities identify, plan, and submit timely projects, cost estimates, and budgets to ensure continuing compliance with new

#### E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

regulatory requirements or to correct compliance problems or violations, including those identified during EPA or State environmental inspections.

The development of pollution abatement plans provides a mechanism for ARS to analyze its current/projected funding requirements for pollution abatement projects.

The A-106 process is primarily a system of setting priorities so environmental control projects are completed as required to meet statutory and regulatory requirements. There are never enough funds available to complete all desired projects in one fiscal year. The A-106 process is a five-year plan which prioritizes needed projects over an extended period of time. The primary focus of the process is to give the highest priority to those facilities that are out of compliance or will go out of compliance if project funding schedules are not met.

## 2 Policy

It is the policy of ARS to plan, program, and monitor its facilities to effectively achieve compliance with environmental pollution control requirements. ARS Areas will identify the resources necessary to carry out this policy.

## 3 The A-106 Process Overview as Managed by EPA

The annual A-106 process begins each October, at the start of the fiscal year. At this time, copies of the most recently updated list of pollution abatement projects (Pollution Status Reports) and the latest report to OMB are provided to the EPA Regional program staff by the Federal Facilities Coordinator for review and analysis of priority areas. The Regional program staff review the list of projects and recommend funding and/or schedule changes to be incorporated into the Federal agency's next A-106 submission.

Concurrent with the Region's review of the projects in the Pollution Status Report, Federal agencies review and update their plans for the fiscal year after the current one and the four years after that. The results of this review are reflected in revised five-year plans which Federal agencies submit to Office of Federal Agencies (OFA) by December 15.

## E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

New projects are submitted at this time using EPA Form No. 3500-7.

OFA then prepares a revised Pollution Status Report which is distributed in January to all Federal agencies and EPA Regional offices for review. The EPA Regional reviews are coordinated and quality assured by each of the Federal Facilities Coordinators. The media program staffs conduct the reviews and provide their comments to the Federal Facilities Coordinator. Each project is reviewed to determine its adequacy in three specific areas: (1) engineering; (2) timing; and (3) cost. The EPA Regions also evaluate each project as either High, Medium or Low in terms of its impact on the environment if not funded in the fiscal year requested. In addition, the Regions identify "additional needed" projects which Federal agencies have not proposed or submitted for review.

The marked-up Pollution Abatement Plan worksheets and any inadequate or additional needed project sheets are then submitted by the Regions to OFA in

April. OFA subsequently sends the Federal agencies copies of their worksheet and any inadequate or needed project sheets. These sheets contain the Regional staffs' explanations as to why a project has been rated either "inadequate" or "needed". The Federal agencies then respond to EPA's review by filling out a standard format and updating their previous plan submissions.

Federal agencies must submit their revised updates of the January report to EPA Headquarters by May 31. OFA then prepares a revised report which is distributed to the EPA Regions by the end of June for the last review of the fiscal year. OFA also provides the Regions with worksheets and the Federal agencies responses to the EPA Inadequate and Needed project sheets. During this review Regions focus on those projects in the President's Budget Year (currently +2). Regional staff also will review the submissions to ensure that projects have been proposed to correct violations identified in EPA and State inspections and noncompliance problems in identified program priority areas.

OFA consolidates Regional comments and provides them to EPA Headquarters program staff for review and concurrence. In September, the Administrator provides OMB with a summary of the budget year projects and EPA's evaluations. OMB uses this

## E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

information in its review of Federal agency budget requests.

In October, the most recent Pollution Status Report (i.e., the report revised and distributed in June) and the Report to OMB are distributed to EPA and Federal agencies, initiating the process for the next fiscal year's budget.

On an ongoing basis throughout the fiscal year, the Federal Facilities Coordinators will visit Federal facilities in their respective Regions to attend preliminary planning and design review conferences on major A-106 projects. At a minimum, Coordinators should assist in planning and design reviews for all A-106 projects which are over one million dollars in total cost and for other lesser cost projects which have significant environmental impact. Federal Facilities Coordinators should request assistance and participation from EPA program offices on technical matters where necessary and appropriate.

Where programs are delegated to States, Regions will

provide States with an early opportunity to become involved in the review of Federal agency A-106 submissions on proposed pollution abatement projects. Each Region will provide their respective State agencies with copies of A-106 reports for their States. Each Region will then meet with their States during the January - March review period to review and discuss proposed projects as they relate to State enforcement actions against Federal facilities, general compliance needs of facilities, and identified noncompliance problems. This State review may consist of a review of abbreviated Pollution Status Report prepared by OFA, annual or biannual A-106 submittals from the Federal agencies or some other summary report prepared by OFA or Regional offices.

#### 4 Identifying Pollution Abatement Projects

The need for a pollution abatement project (PAP) generally results from one or both of the following conditions:

a the need to install, upgrade, or replace (very rarely to repair, operate, or maintain) environmental pollution control or detection facilities or equipment, or

#### E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

b the need to eliminate an actual or potential environmental hazard, including investigation activities.

Frequently (unfortunately), the PAP is motivated by a notice of violation from, or a compliance agreement with, a regulatory agency. On other occasions, it will be driven by statutory or regulatory deadlines. It usually is directed towards a facility, unit, or engineered system; seldom, if ever, towards an operation, management system, or work practice. Where possible, PAP's should be undertaken to avoid adverse regulatory action and "crisis" situations.

The "hottest" PAP's for the foreseeable future include resolution of remedial/corrective action needs at

active or inactive hazardous waste treatment or disposal sites or units, underground storage tanks, active or inactive landfills, and drinking water supplies. The later these deficiencies are discovered, particularly if discovery is by a regulatory agency, the less flexibility ARS will have to develop nonprogram

funding sources and to avoid disruption of research activities. In short, if "crises" are to be avoided, early detection of the need for PAP's is crucial. A benefit of this early detection is that ARS gets credit for demonstrating environmental leadership.

## 5 Examples of PAP's and Non-PAP's

The following list presents a few examples of activities or projects that are PAP's:

a expenditures of USDA HWC funds earmarked after FY-88, unless the project was completed before October 1, 1988;

b ARS-funded projects for preliminary assessments, site inspections, remedial investigations or feasibility studies, or remedial actions at hazardous waste sites;

c installation of monitoring systems, secondary containment, overfill protection, or double-walled underground storage tanks;

d construction or modification of an engineered solid waste or hazardous waste treatment or disposal facility or unit;

#### E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

e water treatment systems to comply with the Safe Drinking Water Act;

f upgrading a wastewater treatment unit or connecting to a publicly owned treatment works;

g projects to correct notices of violation or to meet the provisions of a compliance agreement; and

h projects to correct noncompliance or anticipated noncompliance with environmental standards or regulations.

A valid PAP is often not eligible for HWC funding.

The following list presents several examples of activities and projects that are not PAP's:



a Routine hazardous waste disposal or payment of disposal fees;

b license or permit fees or renewals;

c installing new fume hoods, stacks, or ventilation fans;

d operator training or licensing; and

e purchase of pesticide applicator equipment.

## 6 Completing EPA Form 3500-7 for a PAP

One form is required for each PAP. As noted above, PAP's for which forms are required include those for which USDA Hazardous Waste Management Program funds have been, are, or may be earmarked, obligated, or spent, unless the project was completed before October 1, 1988. Also included are any projects whose primary objective is controlling, reducing, eliminating, or cleaning up contamination or hazards in the environment.

PAP's may or may not be fundable with Departmental HWC funds. A given PAP is eligible for HWC funding only if it is required to meet specific RCRA or CERCLA requirements.

## E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

### 7 Guidance For Completing the A-106 Form

The following is line-by-line guidance for completing the January 1992 version of EPA Form 3500-7. If this form changes in any way from the format listed below, the changes will be sent to the field under separate cover.

### Section I - Facility Information

Question 1. State Alpha. Enter the two-letter post office code for the State in which the Location is.

Question 2. Agency/Bureau. If the Location is ARS-owned, enter "1205," the bureau code for ARS. If not ARS-owned, check with the Property Officer for the proper "agency identifier" and enter that number.

Question 3. GSA Installation. Enter the five-digit "GSA facility identifier" for the Location or unit. Obtain this number from the Property Officer.

Question 4. EPA Region. Enter the EPA Region in which the Location is. Use Arabic numerals 01 - 11.

Question 5. Country. Enter "USA" if the Location is in the continental U.S., Hawaii, or Alaska. If the Location is elsewhere, use the country code in the guidance accompanying the form.

Question 6. New Installation. Enter "yes" if this Location has never before had a PAP; otherwise enter "no."

Question 7. Ownership Type. Select and enter in the proper space the correct code from the following:

FF - Federally owned, Federally operated

FC - Federally owned, operated by a private

contractor with the Federal Government

FP - Federally owned, privately operated

PF - Privately owned, constructed for use by the Federal Government and operated by the Federal Government

PL - Privately owned, leased and operated by the Federal Government

#### E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

PI - Privately owned, Indian lands

FI - Federally owned, Indian lands

AX - Mining claims, active mixed ownership

IX - Mining claims, inactive mixed ownership

MA - Mining claims, active on Federal land

MI - Mining claims, inactive on Federal land

Question 8. Name of Installation. Enter Location name.

Question 9. Street Address. Enter street address, not mailing address.

Question 10. City Name. Enter city of mailing address.

Question 11. Zip Code. Enter five- or nine-digit postal zip code for street address.

## Section II - Basic Project Information

Question 1. Agency Project Number. Enter project number, if one has been assigned locally or by the Area. After funds are obligated for a project, consider using the contract number.

Question 2. Operable Unit/Activity Data Sheet. Leave blank unless the project is for Superfund remediation and the facility is on the Superfund National Priority List.

Question 3. Multiple Installations. For projects involving more than one Location, enter "Yes;" otherwise enter "No."

Question 4. Statutory Authority. Enter the code for the (Federal) statute or category governing the need for this project. Note that "RCRA" also covers hazardous wastes subject to the Resource Conservation and Recovery Act (RCRA). Review RCRA Section 3016 submittal to determine whether "RCRA" or "SFND" is the proper code.

ATOM - Atomic Energy Act

CAA - Clean Air Act

CWA - Clean Water Act

ESA - Endangered Species Act

FIFRA - Federal Insecticide, Fungicide, and Rodenticide Act

HPA - Historic Preservation Act

MULT - Multimedia

E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

NCA - Noise Control Act

NEPA - National Environmental Policy Act

NRA - Natural Resources Act

RCRA - Resource Conservation and Recovery Act

SDWA - Safe Drinking Water Act

SFND - Comprehensive Environmental Response, Compensation, and Liability Act, or Superfund

## TSCA - Toxic Substances Control Act

Question 5. Pollutant Category. Enter the appropriate pollutant category code from the list in Appendix B to EPA's instructions for completing the EPA Form 3500-7.

Question 6. Funding Account. Enter any accounting code listed in Appendix C to EPA's instructions for completing the EPA Form 3500-7 that is applicable; otherwise, leave blank. Check with the Area or Location funds manager for funds sources and codes.

Question 7. Year Funding Required. Identify specific year(s) in which funding is required to achieve or maintain compliance. In the narrative, provide the basis for project need (i.e., compliance agreement, to meet regulatory deadline, etc.) and cost estimate.

Question 8. Project Name. Give descriptive project name. If possible, first word should be a verb (i.e., investigate, upgrade, etc.) or a gerund (i.e., investigating, upgrading, retrofitting, etc.).

Question 9. Project Contact Name. Enter the person who is responsible, in the management context, for managing completion of the necessary project.

Question 10. Contact Telephone. Enter the telephone number of the contact person, including area code.

Question 11. Total Cost Estimate. Provide current cost estimates. Indicate source and date of cost estimate in the narrative section. This line covers future fiscal years. Note required format for reported amount.

E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

Question 12. Project Assessment. Enter correct code, using instructions for completing EPA Form 3500-7 for definitions of "high," "medium," and "low." In narrative section, describe basis for code assigned.

Question 13. Compliance Status. Enter proper code, using codes in instructions for completing EPA Form 3500-7. Note that CMPA is the code for an enforceable compliance agreement, and INOV is the code for an issued notice of violation. Either can originate from Federal, State, or local regulatory action.

Question 14. Estimated Requirements Cost. Enter, for each fiscal year in which funds were, are being, or will be spent on this project:



- the operating cost estimate (i.e., the amount to be used for requesting a budget) in the "Requirement" column;
- the budgeted amount (i.e., the amount to be put into, or that was put into, the Location, Area, or agency budget for that fiscal year) or the programmed amount (i.e., that was actually programmed for expenditure in the budget or HPRL process) in the "Programmed/Budgeted" column; and
- the amount actually obligated or spent in the "Obligated" column.

This line covers past and current fiscal years. Note required format for reported amount.

Question 14. Project Milestones. Use action plans, compliance schedules, statutory dates, and other project planning and tracking tools to develop project milestones. Enter these dates in the appropriate column, and use the progress codes on EPA Form 3500-7 to describe the current project status. If the project is complete, enter the fiscal year it was completed in the lower right-hand block provided. Format for dates is month/year; i.e., June 1990 would be 0690. Enter when design/plan was or is projected to be completed, when construction or work was or is projected to be started and completed, the regulatory deadline for full compliance or achieving compliance, a progress code (see below), and the date the project was

completed. Numeric project status (progress) codes are as follows:

#### Code Activity Examples

1 Preliminary Planning (PP) preliminary assessment,  
site inspection

2 Design (DES) remedial investigation, feasibility study, A-E design

3 Construction (CON) installing double-  
walled underground storage tank

4 Work ongoing (non- remedial  
construction) (WRK) action/site cleanup

5 Completed (CMPL) installation complete, compliance achieved

6 Discontinued (DISC) no further action required

7 Deferred (DEF) a waiver because of technology unavailability

8 Other (OTH) providing alternate water supply to community, identify in project description

9 Continuous (CNTS) environmental monitoring

E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

### Section III - Project Narrative

**Description.** Provide full project description, up to 500 characters long. Identify legal requirements, pollutant(s) to be controlled, equipment/controls to be purchased/installed, etc. Include information for items as noted above.

## 8 Guidance for Updating the Federal Facility Information System (FFIS) Printouts for A-106 Updates

### a Background

This guidance follows the organization of the FFIS printouts. Each line of the FFIS printouts has one to nine "fields" of information to be reviewed, most of which correlate with a question on EPA Form 3500-7. For ease of reference, the corresponding section of EPA Form 3500-7 is identified. Additional information on the contents and format of each field can be obtained by reviewing the line-by-line guidance

for completing EPA Form 3500-7. A copy of the Form can be obtained from the Area servicing ASHM.

### b Line-by-line guidance

Each line and field should be reviewed for accuracy and currency. If any information is incorrect or outdated, the incorrect information should be crossed out with red ink and the correct or current information hand printed or typed in red ink.

Line A is the page heading. It contains three fields, the date the form was printed in the upper left corner, the words "Federal Facilities Information System" in the center column, and the page number from EPA's "data dump" in the upper right corner. Line B contains the words "Pollution Status Report - Agency Plan" and "Sorted By: Agency" in 2 fields.

Line 1 starts the actual report, and it contains 3 fields. The first and second fields on this line should be respectively "Agricultural Research Service" and "Department of Agriculture," indicating that this report is for a facility owned or controlled by ARS. This

information was generated from the "1205" code

E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

in Section I.2 of EPA Form 3500-7. The third field on this line is the street address, and it corresponds to Section I.9 of EPA Form 3500-7.

Line 2 contains 4 fields. The first field is the General Services Administration (GSA) Federal facility identification number. This field correlates with Sections I.1, I.2, and I.3 on EPA Form 3500-7. It's format is AA-NNNNnnnnn, where the "AA" is the two-letter postal code for the State in which the facility is located (from Section I.1), the "NNNN" is the agency code (1205 for ARS, from I.2), and the "nnnnn" is a unique facility identifier assigned by GSA (from I.3). The Real Property Officer can help verify this number. The second field identifies the facility as belonging to USDA-ARS or another agency. The contents of this field are generated from the information provided in Section I.2 of EPA Form 3500-7. The third field is the facility/Location name. It correlates with Section I.8 of EPA Form 3500-7. The fourth field is the city in which the facility is located. It correlates with Section I.10 of EPA Form 3500-7.

Line 3 contains 5 fields. The first field contains the EPA region in which the facility is located, correlating with Section I.4 of EPA Form 3500-7. The second field identifies the site as on the Superfund National Priority List (NPL) or not, blank signifying "no." This information derives from the response to Section II.2 on EPA Form 3500-7. The third field is the EPA (hazardous waste) identification number. It was assigned by EPA or an authorized State after the Location filed an EPA Form 8700-12, Notification of Hazardous Waste Activity. See 40 CFR 262 for additional information on the 8700-12 form, and 40 CFR 270-271 for information on the process used to assign numbers. The fourth field is the 2-letter postal code for the State in which the facility is located, correlating with Section I.1 of EPA Form 3500-7. The fifth field is the facility ZIP code, correlating with Section I.11 of EPA Form

3500-7.

Line 4 is blank.

#### E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

Note: Lines 1 through 4 are not duplicated when more than one project at an individual facility/Location is printed on a single page.

Line 5 contains 3 fields. The first field is the project number, correlating with Section II.1 of EPA Form 3500-7. The second field is the project name, correlating with Section II.8 of EPA Form 3500-7. The third field is the year funding is required to achieve or maintain compliance, correlating with Section II. 7 of EPA Form 3500-7.

[http://imagepc/fd/shemb\\_tools/manual230\\_93ver/D\\_Environmental Planning.htm](http://imagepc/fd/shemb_tools/manual230_93ver/D_Environmental Planning.htm)

was first entered into the FFIS. The fourth field shows the projected or actual construction/work completion date of the project, correlating with Section II.15 of EPA Form 3500-7.

Line 9 contains 4 fields. The first field shows the compliance status of the facility with regard to this project, correlating with Section II.13 of EPA Form 3500-7. The second field presents the priority of this project, correlating with Section II.12 of EPA Form

3500-7. Codes and explanations are provided in EPA's instructions for completing EPA Form

3500-7. The third field shows the when the FFIS record for this project was last revised. If new information is submitted with this update, the next printout would reflect a mid-1993 revision date. The fourth field gives the month and year final compliance is required, based on information provided in response to Section II.15 of EPA Form 3500-7.

Line 10 contains 2 fields. The first field is the account from which project funds will be drawn, correlating with Section II.6 of EPA Form 3500-7. If the account is not listed in EPA's instruction for completing EPA Form 3500-7, this field should be left blank. The second field is the fiscal year in which the project was actually completed. After an entry appears in this field, the project would eventually be removed from the "active" A-106 process.

Line 11 contains the column headings for lines 12, 13, and 14. On this update, they are the fiscal years 1991 through 1999.

Line 12 contains 9 fields, one for the estimated funds requirement for each fiscal year of interest in this update. This line correlates with Section II.14 of EPA Form 3500-7. Enter/

update the amount of funds estimated to be needed for each of the listed fiscal years, remembering that all entries for a project started and completed within this time period should sum to the total cost



estimate for the project (second field on line 8). Years with no projected funds requirement would have "0" in the appropriate fields. Note the required format for these fields.

## E OFFICE OF MANAGEMENT AND BUDGET CIRCULAR A-106 (A-106) (Continued)

Line 13 contains 9 fields, one for the amount of funds budgeted or programmed in each fiscal year of interest in this update. This line correlates with Section II.14 of EPA Form

3500-7. Enter/update the funds that were, are, or will be budgeted (i.e., put into the Location, Area, or agency budget for that fiscal year) or the programmed amount (i.e., actually programmed for expenditure in the budget or HPRL process) in each of the listed fiscal years. Entries in this line should be consistent with those on lines 13 and 8. Years with no budgeted/programmed funds would have "0" in the appropriate fields. Note the required format for these fields.

Line 14 contains 9 fields, one for the amount of funds obligated or spent in each fiscal year of interest in this update. This line correlates with Section II.14 of EPA Form 3500-7. Enter/update the funds that were or are obligated in each of the listed fiscal years. Entries in this line should be consistent with those on lines 13 and 8. Years with no project expenditures or obligations would have "0" in the appropriate fields. Note the required format for these fields. For additional information on what constitutes obligated or spent funds, consult with Area budget/fiscal officers.

Line 15 contains 9 fields, one for a revision date for each year of interest in this update. This line is for EPA's administrative use.

Lines 16 to end of project record contain a narrative discussion of the need for the project, including regulatory references, and a description of what will be done. This section correlates with Section III of EPA Form 3500-7.

## F EXHIBITS

### 1 List of Issues for Potential Consideration When Developing an Environmental Assessment

#### Exhibit 1

##### List of Issues for Consideration

##### When Developing an Environmental Assessment

Will proposed construction action:

a. Cause or contribute to soil erosion by wind or water?

- b. Affect soil surface stability?
- c. Degrade water quality in a Sole Source Aquifer?
- d. Decrease aquifer yield or affect water rights?
- e. Affect aquatic life?
- f. Cause or contribute to flow variation in a stream or spring?
- g. Degrade the aesthetic properties and/or potential uses of either ground or surface waters?
- h. Affect chemical quality of ground or surface waters (pH, dissolved oxygen, nutrients, dissolved solids, pesticides, etc.)?
- i. Affect physical quality of ground or surface waters (suspended solids, turbidity, color, oil, temperature, etc.)?

j. Cause odors or release odoriferous substances to air or water?

k. Release toxic substances to the air in quantities that could affect human or safety, or environmental quality?

l. Release particulate matter to the air?

m. Change local meteorological conditions or air movement patterns?

n. Release substances for which there is a National Ambient Air Quality Standard (i.e., sulfur oxides, nitrogen oxides, carbon monoxide, lead, particulate matter, etc.)?

o. Affect undisturbed natural areas or a wild and scenic river?

p. Affect game animals or fish or their taking?

q. Affect rare, threatened, or endangered species, or a critical habitat? (A consultation with U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act may be required.)

r. Affect species balance, especially among predators?

s. Involve special hazards, such as radioactivity or electromagnetic radiation?

Exhibit 1 (Continued)

t. Affect or be located in a wetland, flood plain, or the coastal zone?

u. Affect a known or potential cultural, historical, or archaeological site, district, or area? (A consultation with the State Historical Preservation Officer is required.)

v. Affect local or regional systems related to:

- 1) transportation?
- 2) water supply?
- 3) power and heating?
- 4) solid waste management?
- 5) sewer or storm drainage?

w. Affect local land use through effects on:

- 1) flood plains or wetlands?
- 2) location land use?
- 3) aesthetics?
- 4) access to minerals?

x. Affect socioeconomic aspects of an area, including:

- 1) population?
- 2) housing supply or demand?
- 3) employment?

4) commercial activities?

5) industrial activities?

6) cultural patterns?

y. Cause or contribute to unacceptable noise level?

z Affect public health or safety?

aa. Cause public reaction or controversy?